

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	NO. 04-10330-JLT
v.)	
)	
REUBEN LAMONT LACEFIELD,)	
Defendant.)	
)	

JOINT INTERIM STATUS CONFERENCE MEMORANDUM

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, and defendant REUBEN LAMONT LACEFIELD, by and through his counsel, Page Kelley, Esq., jointly submit this memorandum to address the issues delineated in L.R. 116.5(A)(1)-(7).

1. The parties do not seek additional relief with regard to the timing requirements imposed by L.R. 116.3. The defendant respectfully requests an additional sixty (60) day period with which to further examine the discovery in this and other matters pending against the defendant. Defense counsel has retained a psychiatrist to evaluate the related mental condition of the defendant and counsel expects that a report will be prepared by the psychiatrist at or near the end of this month (August). That report may be of importance to resolution of this matter.

2. The Court has already set dates for discovery and reciprocal discovery should the matter go forward to trial.

3. The government has provided full and open-file discovery to the defense counsel and will continue to provide full and open-file discovery if and when further evidence becomes available to the government. The government does not anticipate providing any additional

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discovery (other than that required to be produced at least twenty-one days prior to trial) but allows that it might do so in response to specific defense requests.

4. A motion date has already been set by the Court for the filing of substantive motions (and the responses thereto).

5. The parties would request that the time from the filing of this Joint Memorandum through the date on which the Final Status Conference is scheduled by this Court be excluded from calculation under the Speedy Trial Act, the reasons for which include that the parties continue to actively examine the evidence in an effort to seek resolution of this matter short of trial, pursuant to 18 U.S.C. § 3161(h)(1)(F).

6. At this juncture, the parties continue to consider a trial to be unlikely, although the defendant has not made a final determination as to whether the matter will proceed to trial. The parties are actively pursuing such a resolution with the relevant state authorities, making the discussions more complex and wide-ranging than otherwise may be apparent to this Court.

7. The Final Status Conference should be set coincident with the conclusion of the briefing period that the Court sets for the defendant's substantive motions (with consideration given to the defendant's request for an additional sixty (60) days.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul R. Moore
Paul R. Moore
Assistant United States Attorney

REUBEN LAMONT LACEFIELD
Defendant

By: /s/ Page Kelley
Page Kelley, Esq.
Counsel for Mr. Lacefield

DATE: August 1, 2005